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11 the United States of America

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13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 SYLVIA AHN,

16 Plaintiff,

CASE NO. 1:22-CV-00586-CDB

17 v.
18 GEO GROUP, INC., et al.,
19 Defendants.

UNITED STATES' UNOPPOSED NOTICE OF
REQUEST TO SEAL DOCUMENT

20 Local Rule 141

21 Defendant United States of America hereby makes this *unopposed* request that a document be
22 filed under seal in accordance with Local Rule 141 regarding its Motion to Dismiss to Plaintiff Sylvia
23 Ahn's Second Amended Complaint.

24 Plaintiff's Second Amended Complaint brings claims against The GEO Group, Inc., Immigration
25 and Customs Enforcement (ICE), and the United States in connection with her father's suicide while
26 detained at the Mesa Verde federal detention center. ICE and the United States responded to the Second
27 Amended Complaint with a motion to dismiss. At issue in the Motion to Dismiss, among others, are the
28 provisions of the contract between GEO and ICE governing GEO's operation of Mesa Verde.

29 The United States requests that Exhibit 2-B to the Declaration of Natasha Nguyen be filed under
30 seal because it potentially involves competitive information, and/or safety or security information
31 relating to the operation of Mesa Verde and other facilities operated by GEO. Indeed, Attachment 19
32 explicitly states (page 21) that "[t]he Government considers such information privileged or
33 confidential." After discussions between counsel for plaintiff and counsel for ICE and the United States,
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1 plaintiff has reviewed Exhibit 2-B and agrees that in the current posture of the case and for current
2 purposes of the present lawsuit, the contents of Exhibit 2-B may include financial, safety and/or security
3 information that is agreed to be protected from disclosure pursuant to general safety and/or security
4 concerns of employees and detainees at Mesa Verde and other GEO-operated detention facilities, as well
5 as the financial privacy rights or competitive proprietary rights of ICE and GEO. The parties wish to
6 protect the safety and privacy rights of the parties and any other third parties regarding safety, security,
7 and/or financial information about the operation of Mesa Verde from unauthorized and unnecessary
8 disclosure, and to prevent the possibility of any misuse or unnecessary disclosure of any safety, security
9 and/or financial information regarding operation of Mesa Verde.

10 Therefore, for the foregoing reasons, the parties agree that the portion of the contract between
11 GEO and Mesa Verde attached as Exhibit 2-B to Defendants' Motion to Dismiss be filed under seal.
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14 Respectfully submitted,

15 Dated: June 16, 2023

PHILLIP A. TALBERT
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17 By: /s/ Brodie M. Butland
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19 Attorneys for Defendant
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